

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AMERICAN PATENT DEVELOPMENT
CORPORATION, LLC,

Plaintiff,

v.

MOVIELINK, LLC,

Defendant.

Civil Action No. 07-605-JJF

PLAINTIFF'S MOTION TO COMPEL DISCOVERY

Plaintiff American Patent Development Corporation, LLC, by counsel, hereby moves the Court to compel certain discovery from the defendant, Movielink, LLC.

The specific grounds for this motion are set forth in the accompanying brief in support of this motion.

Dated: March 14, 2008

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CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2008, copies of the foregoing *Plaintiff's*
Motion to Compel Discovery were served upon the following counsel of record in the
manner indicated:

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STATEMENT UNDER LOCAL RULE 7.1.1

The undersigned counsel for the moving party hereby states that, pursuant to Local Rule 7.1.1, a reasonable effort has been made to reach agreement with the opposing party on the matters set forth in the accompanying motion to compel discovery. Such effort was made through numerous telephone conferences; plaintiff's correspondence to defendant on January 25, February 4, 15, 25, and 29, and March 10 and 11, 2008; and defendant's correspondence to plaintiff dated February 4 and 12, and March 10 and 11, 2008.

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